ZENECA
Pharmaceuticals
A Business Unit of Zeneca Inc.

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OCT 11999

Dockets Management Branch
Food and Drug Administration
HFA No. 09305, Room No. 1061
5630 Fishers Lane
Rockville, MD 20852

Dear Madam/Sir:

Re: Docket 99D92013

Reference is made to the FDA Draft Guidance entitled, "Cooperative Manufacturing Arrangements for Licensed Biologics," which was published in the Federal Register on August 3, 1999.

Astra Pharmaceuticals and Zeneca Pharmaceuticals have reviewed this draft document; our comments are provided below:

- page 8, first paragraph, last sentence - We suggest that the Agency amend this sentence to, "This may include, but is not limited to, review of all batch records and manufacturing deviations and defects, and periodic audits, *in accordance with the agreement between the contract manufacturer and the license applicant.*" This amendment would help clarity that the license applicant is not strictly required to review all batch records in depth.

- page 8, second paragraph, last sentence - Please clarify the type of compliance actions that may be taken against the licensee and the contract manufacturer, with respect to CGMP violations. Further, please clarify under what conditions would the licensee be liable for a contractor's non compliance with CGMP. For example, would the licensee be held accountable in cases of fraudulent operation by a contractor?

- page 8, third paragraph, third sentence - This sentence states for each contract arrangement "... 3) a list of all standard operating procedures applicable to the contract arrangement," be submitted in the licensee's application. We believe that the list of all standard operation procedures, applicable to the contract, should be maintained and available upon inspection.

99D-2013

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Please do not hesitate to contact me if you require clarification on any of the above comments.

Sincerely,

Robert Castor
Assistant Director
Chemistry, Manufacturing and Controls Group
Regulatory Affairs Department
(302) 886-2594
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RC/CSF/jr

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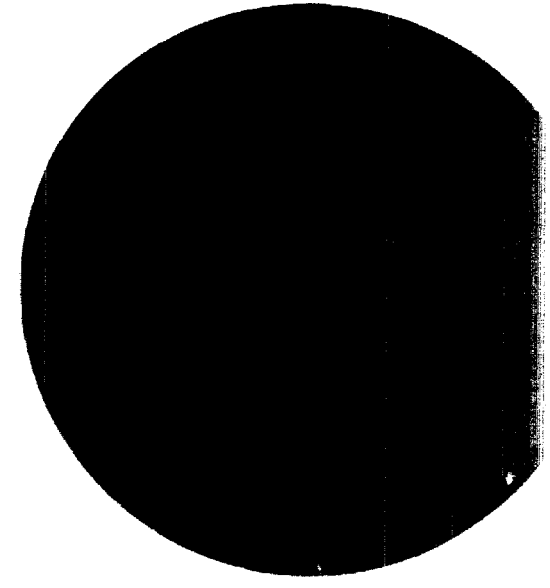

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